

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
ORANGEBURG DIVISION

ANN J. WYLY,	)	Civil Action No. 5:17-cv-00689-JMC-SVH
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
THE REGIONAL MEDICAL CENTER	)	
OF ORANGEBURG AND	)	
CALHOUN COUNTIES, AND	)	
MICHELLE GRANT, IN HER	)	
INDIVIDUAL CAPACITY AND	)	
GARY FERGUSON, IN HIS	)	
INDIVIDUAL CAPACITY,	)	
	)	
Defendants.	)	

**DEFENDANTS ANSWERS**  
**TO LOCAL RULE 26.01 INTERROGATORIES**

Defendants, Regional Medical Center of Orangeburg and Calhoun Counties and Michelle Grant, in her Individual Capacity and Gary Ferguson, in his Individual Capacity (hereinafter “Defendants”), answer Local Rule 26.01 Interrogatories as follows:

**LOCAL RULE 26.01 INTERROGATORIES**

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

**ANSWER:** None.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

**ANSWER:** Jury.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party’s stock (2) each publicly-owned company of which it is a parent

and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.

**ANSWER: Not applicable.**

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

**ANSWER: Defendants agree that the division is appropriate.**

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reasons would entail substantial duplication of labor if heard by different judges.

**ANSWER: No.**

(F) If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

**ANSWER: Defendant Regional Medical Center is properly identified.**

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

**ANSWER: Not applicable.**

Respectfully submitted,

FISHER & PHILLIPS LLP

By: /s/ C. Frederick W. Manning II  
C. Frederick W. Manning II (FID 7001)  
fmanning@fisherphillips.com  
George A. Reeves III (FID 9701)  
greeves@fisherphillips.com  
Post Office Box 11612  
Columbia, South Carolina 29211  
Telephone: (803) 255-0000  
Facsimile: (803) 255-0202

ATTORNEYS FOR DEFENDANTS

Dated this 4th day of April 2017.